

# **Exhibit B**

**From:** [Mulherin, Joseph](#)  
**To:** [Patrick Trainor, Esq.](#); [Starbuck, Emily](#)  
**Subject:** RE: D'Ambly - Proposed Discovery Confidentiality Order  
**Date:** Thursday, December 1, 2022 7:32:19 PM

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Patrick,

Thank you for your email. Our disproportionate/irrelevance/over-breadth objections stem from you asking NYDN to search the email boxes of every employee at NYDN, including individuals who had no role in Mr. Exoo's termination. We are happy to meet and confer with you about your requests and our objections. What time works for you on Monday?

Best regards,  
Joe

JOSEPH MULHERIN  
Partner

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**From:** Patrick Trainor, Esq. <pt@PTESQ.COM>  
**Sent:** Thursday, December 1, 2022 7:15 PM  
**To:** Starbuck, Emily <Estarbuck@mwe.com>  
**Cc:** Mulherin, Joseph <jmulherin@mwe.com>  
**Subject:** Re: D'Ambly - Proposed Discovery Confidentiality Order

**[ External Email ]**

The responses are a joke right? I mean you're claiming that producing the names(s) of the person(s) who disclosed D'Ambly's confidential personnel information to Exoo is overly burdensome? That's a five-word question. Do you want me to tell you those name(s) and their contact information to ease your burden?

And then you're objecting to number 3 because I asked for *every* (your emphasis), but number 4, similar question you respond by stating you are not aware of any responsive documents? Firstly, that's bush league and you know it. Secondly, I am aware of responsive documents that are in your client's possession, so there is no way you are not aware of responsive documents. Please amend because it will get awkward if I supplement my production with communications between Exoo and your client concerning D'Ambly and his termination. Personal calls and emails count.

See you in NY Post.

Sincerely,